

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ANGEL LUIS RIVERA SANCHEZ
AILEEN LOPEZ SOTO

DEBTORS

BKRTCY. NO. **10-11860 MCF**

CHAPTER 7

MOTION FOR REOPENING OF CASE UNDER 11 U.S.C. §350(b)

TO THE HONORABLE COURT:

COME NOW, **ANGEL LUIS RIVERA SANCHEZ** and **AILEEN LOPEZ SOTO**, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. On December 20, 2010, the debtors filed a petition for relief under Chapter 7 of Title 11, 11 U.S. Code §§701 *et seq.*
2. On January 18, 2011, the appointed Chapter 7 Trustee Noreen Wiscovitch Rentas, Esq., filed a *Report of No Distribution*, docket entry #12 and Court issued a *Notice of Abandonment*, at docket entry #13, in the above captioned case.
3. On May 09, 2011, this Honorable Court entered a *Discharge of Debtor and Joint Debtor*, docket entry #18, in the above captioned case.
4. On May 09, 2011, the Court issued an *Order Discharging Trustee and Closing the Estate*, docket entry #19.
5. In the present case, First Bank filed proof of claim #03-1, as an **unsecured creditor** in the sum of \$50,837.41, on the basis of a car lease deficiency balance.

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6. That after the aforementioned unsecured claim was discharged, First Bank continued collection efforts against the herein debtors, continuing said collection efforts against the debtors, as of the date of this Complaint.

7. Under Section 350(b) of the Bankruptcy Code, 11 U.S.C. §350(b), a debtor may request by motion that the court reopen a case to accord relief to the debtor or for other cause. 11 U.S.C. §350(b) and Rules 5009 and 5010 of the Federal Rules of Bankruptcy Procedure.

8. The debtors respectfully request this Honorable Court to Order the reopening of the above captioned bankruptcy case to allow the debtors to file an adversary proceeding for violation of the discharge injunction awarded to debtors upon the entry of the Discharge Order and to enjoin First Bank, of any further action against the herein debtors to collect on said discharged debt. Rules 5009 and 5010 of the Federal Rules of Bankruptcy Procedure.

NOTICE UNDER P.R. LBR 5010-1:

You are hereby notified that the debtor has filed a motion for the re-opening of her Chapter 7 case. All parties in interest are given twenty-one (21) days and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f), if you were served by mail, to object or oppose, in writing, the debtors' request for case re-opening.

Notice is hereby given that any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other

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response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I HEREBY CERTIFY that on this same date a copy of this motion was electronically filed using the CM/ ECF system which will send notification of same to: the Chapter 7 Trustee Noreen Wiscovitch Rentas, Esq.; US Trustee's Office, Monsita Lecaroz, Esq., Assistant US Trustee; and via regular US Mail to First Bank, Bankruptcy Division, PO Box 9146 San Juan PR 00908-0146; Angel Luis Rivera Sanchez and Aileen Lopez Soto, 306 Mansiones de Coamo PR 00769, debtors in the above captioned case; and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 01st day of August, 2016.

/s/Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
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Label Matrix for local noticing 0104-2 Case 10-11860-MCF7 District of Puerto Rico Ponce Mon Aug 1 13:37:24 AST 2016 VATIV RECOVERY SOLUTIONS LLC PALISADES COLLECTION/ASTA FUNDING PO BOX 40728 HOUSTON, TX 77240-0728	BANCO BILBAO VIZCAYA ARG PO BOX 364745 SAN JUAN, PR 00936-4745 US Bankruptcy Court District of PR Jose V Toledo Fed Bldg & US Courthouse 300 Recinto Sur Street, Room 109 San Juan, PR 00901-1964	POPULAR AUTO PO BOX 366818 SAN JUAN, PR 00936-6818 ASOCIACION EMPLEADOS AEBELA PO BOX 362766 SAN JUAN, PR 00936-2766
ASOCIACION EMPLEADOS ELA PO BOX 364508 SAN JUAN, PR 00936-4508	BANCO BILBAO VIZCAYA ARGENTARIA PR ANGEL M. VAZQUEZ BAUZA PO BOX 191017 SAN JUAN PR 00919-1017	BANCO POPULAR DE PR PO BOX 70100 SAN JUAN, PR 00936-8100
BBVA PUERTO RICO PO BOX 364745 SAN JUAN, PR 00936-4745	CITIFINANCIAL 1 CITIBANK DR STE 201 SAN JUAN, PR 00926-9600	CITIFINANCIAL PLUS PO BOX 499 HANOVER, MD 21076-0499
DORAL FINANCIAL 1451 FD ROOSEVELT AVE SAN JUAN, PR 00920-2717	FIRST BANK BANKRUPTCY DIVISION PO BOX 9146 SAN JUAN PR 00908-0146	FIRST BANK MONEY EXPRESS PO BOX 19327 SAN JUAN, PR 00910-1327
FIRST BANK PO BOX 19327 SAN JUAN, PR 00910-1327	G JWL/CBSD PO BOX 6497 SIOUX FALLS, SD 57117-6497	ISLAND FINANCE PO BOX 195369 SAN JUAN, PR 00919-5369
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PALISADES COLLECTIONS LLC VATIV RECOVERY SOLUTIONS LLC AS AGENT FOR PALISADES COLLECTIONS ASTA FUNDING PO BOX 40728 HOUSTON TX 77240 0728	PR FCU PO BOX 998 SAN JUAN, PR 00936	SAMS PO BOX 105980 DEPT 77 ATLANTA, GA 30348-5980
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AILEEN LOPEZ SOTO 306 MANSIONES DE COAMO COAMO, PR 00769	ANGEL LUIS RIVERA SANCHEZ 306 MANSIONES DE COAMO COAMO, PR 00769	MONSITA LECAROEZ ARRIBAS OFFICE OF THE US TRUSTEE (UST) OCHOA BUILDING 500 TANCA STREET SUITE 301 SAN JUAN, PR 00901

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End of Label Matrix	
Mailable recipients	31
Bypassed recipients	0
Total	31